

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

VISHNU VARDHAN NALI,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 25-cv-03969
KRISTI NOEM, Secretary, Department of)	
Homeland Security; TODD LYONS, Acting)	Judge Rowland
Director of the Immigration and Customs)	
Enforcement, each in their official capacity and)	
not individually; and UNITED STATES)	
DEPARTMENT OF HOMELAND SECURITY,)	
)	
Defendants.)	

JOINT STATUS REPORT

On May 28, 2025, this court ordered [Doc. #37] the parties to file a second joint status report by 6/3/25 indicating (1) whether the matter will be resolved; or (2) proposing a briefing schedule on the pending motion for preliminary injunction and response to the complaint.

Plaintiff's position is that, absent a continuation of the TRO previously entered by this Court, Plaintiff has no protection against all of the harms articulated in Plaintiff's motion for temporary restraining order, as well as additional harms that exist in light of Defendants' new SEVIS policy; that the Government has not responded to Plaintiff's proposed settlement agreement submitted on May 23, 2025; and that therefore the parties should proceed with briefing Plaintiff's motion for preliminary injunction (Doc. #26). The Government's responsive pleading is presently due on June 13, 2025. Plaintiff proposes that Defendants' response to Plaintiff's motion for preliminary injunction should be filed seven days thereafter, on June 20, 2025; and Plaintiff's reply on or before June 27, 2025.

Defendants' position is that its counsel is awaiting a response from its client on proposed settlement terms. Defendants have stipulated to dismissal in other, similar cases across the country, but that is a time-consuming process while they are still fending off multiple motions for preliminary injunctive relief in this judicial district. In that regard, defendants believe that no preliminary injunctive relief is appropriate here because there is simply no irreparable injury. And even if there were, the plaintiffs is already covered by a nationwide injunction entered by the Northern District of California. *See* Dkt. 35-3; *Doe v. Trump*, No. 25-cv-3140, Dkt. 69 (N.D. Cal. May 22, 2025). At this point, defendants' response or answer to the complaint is due on June 13, 2025 (as defendants were served on April 14, 2025). Defendants are hopeful that this matter will be settled and/or stipulated for dismissal by that date, but if that does not occur, defendants agree with the proposed schedule for the motion for preliminary injunction outlined above.

DATED: June 3, 2025

/s/ Jeffrey Grant Brown
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Respectfully submitted,

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